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Subject: for future consideration

Jayne,

This is not going to be in our comments on the Survey, but is relevant to the HH risk assessment. Im providing it for your information.

IMPLICATIONS FOR THE HUMAN HEALTH RISK ASSESSMENT

The memorandum concludes that most of the fish caught during the survey are smaller in size (< 15 cm) than preferred by anglers for consumptions (greater than 20 cm or 8 inches). Also, the only type of fish found larger than 20 cm in length is carp, but this is not considered a recreationally desirable fish species. The memorandum also noted that six anglers were seen fishing at the Force Lake during the summer months. To meet "the default fish consumption rate (17.5 grams per day per person) of Oregon Department of Environmental Quality (ODEQ)", it would require that "the six anglers combined catch 168 large carp per year or 336 to 504 medium-sized carp per year from Force Lake." It is not clear how these numbers of carp were derived. The memorandum should be revised to clarify and present the quantitative assumptions and supporting information that form the basis for the estimated quantity of carp.

The fact that the superintendent of the Heron Lakes Golf Course reported seeing five or six people fishing at the Force Lake during summer months demonstrates that there is recreational fishing at the lake. Although the size of fish caught during the May 2009 sampling may be considered too small for anglers' preferable size to eat, it does not exclude the possibility that recreational receptors may eat the fish that they catch from the Force Lake.

It is assumed for this review that the fish survey memorandum will be included in the human health risk assessment report and used to support the Voluntary Group's opinion that the fish consumption exposure pathway for the Force Lake is not warranted. If this is the case, it is recommended that the potential consumption of fish by recreational anglers at the Force Lake have a quantitative summary evaluation in the Uncertainty Analysis section of the human health risk assessment report. It is also suggested that the ODEQ's fish consumption rate of 17.5 gram per day per person cited in the memorandum (footnote No. 6 on page 7 and first paragraph on page 8) be changed to 175 grams per day per person which is the ODEQ's consumption rate as updated on October 23, 2008.

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